

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS

STATE OF MISSOURI

LARRY D. COLEMAN,

Plaintiff,

v.

MYRTLE HILLIARD DAVIS COMPREHENSIVE  
HEALTH CENTERS, INC.; TERESITA A. COMETA,  
M.D., HENRY BRADFORD, D.P.M., AND  
SAINT LOUIS CONNECTCARE,

Defendants,

Serve: Myrtle Hilliard Davis Comprehensive  
Health Centers, Inc.  
Registered Agent, Myrtle H. Davis  
5471 Dr. Martin Luther King Drive  
St. Louis, Missouri 63112

Serve: Teresita A. Cometa, M.D.  
5471 Dr. Martin Luther King Drive  
St. Louis, Missouri 63112

Serve: Henry Bradford, D.P.M.  
5471 Dr. Martin Luther King Drive  
St. Louis, Missouri 63112

Serve: Saint Louis ConnectCare  
Registered Agent: Gregg J. Lepper  
10 South Broadway  
2000 Equitable Building  
St. Louis, Missouri 63102

Cause No. 1022-CC00620

Div. No.

PETITION

COMES NOW Plaintiff Larry D. Coleman and for his Petition against Defendants Myrtle Hilliard Davis Comprehensive Health Centers, Inc., Teresita A. Cometa, M.D., Henry Bradford, D.P.M. and Saint Louis ConnectCare, states as follows:

1. Plaintiff Larry D. Coleman is a resident and citizen of Missouri.
2. Defendant Myrtle Hilliard Davis Comprehensive Health Center, Inc. is a corporation or other business association with its principal place of business in Missouri.
3. Defendant Teresita A. Cometa, M.D. is a physician practicing her profession in the City of St. Louis, Missouri.
4. Henry Bradford, D.P.M. is a podiatrist practicing his profession in St. Louis, Missouri.
5. Defendant Saint Louis ConnectCare is a corporation or other business association with its principal place of business in Missouri.
6. All Defendants provide healthcare services in the City of St. Louis, Missouri.
7. Defendant Dr. Cometa and Defendant Bradford were, at all relevant times, agents, servants or employees of Defendant Myrtle Hilliard Davis Comprehensive Health Center, Inc. acting within the course and scope of their agency, service or employment.
8. Plaintiff Larry D. Coleman received examination, care and treatment at the healthcare facilities of Defendant Myrtle Hilliard Davis Comprehensive Health Center, Inc. from time to time and for a period of months complained of increasing pain, swelling, discoloration in his legs, knees, ankles, feet and toes including visits on April 18, 2008 when he was seen by Defendant Dr. Bradford and April 24, 2008 when he was seen by Defendant Dr. Cometa.
9. Plaintiff Larry D. Coleman received examination, care and treatment at the healthcare facility of Defendant Saint Louis ConnectCare Community Health Center from time to time over a period of months when he complained of increasing pain, swelling and/or

discoloration in his legs, knees, ankles, feet and/or toes, through and including March 21, 2008 when he was seen by a Nurse Practitioner.

10. On or about May 7, 2008 Plaintiff Larry D. Coleman was admitted to DePaul Health Center with a complaint of pain in both legs; he was found to have severe peripheral vascular disease and, in due course, both legs were amputated.

11. Defendants, individually and by and through their agents, servants and employees, failed to use that degree of skill and learning ordinarily used under the same or similar circumstances by members of Defendants' profession(s), and so were negligent in one or more of the following respects:

- (A) Failed to diagnose and treat increasingly severe pain, swelling and discoloration in the lower extremities, legs, knees, ankles, feet and/or toes;
- (B) Failed to diagnose and treat peripheral vascular disease;
- (C) Failed to adequately treat diabetes;
- (D) Failed to refer to a specialist; and/or
- (E) Failed to hospitalize Plaintiff.

11. As the direct and proximate result of the negligence mentioned above, Plaintiff Larry D. Coleman had both of his legs amputated, required extensive hospitalization, confinement in a rehabilitation facility and extensive in home care, all at great expense; has lost the ability to walk or move at all without a wheelchair; has endured great pain and suffering and emotional distress; and has lost the ability to work and enjoy life.

WHEREFORE, Plaintiff Larry D. Coleman prays for judgment in his favor and against Defendant Myrtle Hilliard Davis Comprehensive Health Center, Inc., Teresita A. Cometa, M.D.,

Henry Bradford, D.P.M. and/or Saint Louis ConnectCare for an amount in excess of \$25,000.00 and for his costs.

**THE PERRON LAW FIRM, P.C.**



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ATTORNEYS FOR PLAINTIFF

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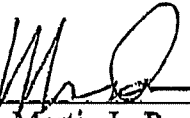
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ATTESTATION OF MARTIN L. PERRON

COMES NOW Martin L. Perron, being of legal age and first duly sworn, and states as follows based upon his personal knowledge:

1. I am the attorney for Plaintiff Larry Coleman. We have not attached a Certificate of Merit of the type required or called for by the statutes due to a concern that a Statute of Limitations might expire.



Martin L. Perron